

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

IN RE: WARFIELD HISTORIC PROPERTIES, LLC, <i>et al.</i>, Debtors.)))))))	Case Nos. 24-12500; 24-12504; 24-12506 24-12508; 24-12511 (Jointly Administered Under Case No. 24-12500) Chapter 11
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**RESPONDENT THE TOWN OF SYKESVILLE’S
OBJECTIONS TO DEBTOR WARFIELD CENTER, LLC’S
EXHIBITS FOR HEARING ON AUGUST 5, 2024, AT 2:00 P.M.**

Respondent The Town of Sykesville (the “Town”), by its undersigned counsel, hereby submits its objections to the exhibits identified in Debtor Warfield Center, LLC’s List of Exhibits¹ (Docket 84) in connection with the hearing to consider Debtor’s Motion for Order Approving Sale of Real Property Free and Clear of All Liens, Claims, Interests and Encumbrances Pursuant to 11 U.S.C. §§ 363(b) and (f) (Docket 44), and the Town’s Objections thereto (Docket 57):

Exhibit No.	Description	Bases for Objections
M02	Steven McLeaf Declaration	The Town objects to the contents of Exhibit M02 to the extent it (i) asserts legal conclusions (as in, but not limited to, the statement in paragraph 4 that the proposed sale is “within the ordinary course of business” of the Debtor); and (ii) contains hearsay and/or characterizes the contents of documents, including expert reports, that have not been offered in evidence (as in, but not limited to, statements in paragraph 27 characterizing the contents of valuation and appraisal reports)
M03	Purchaser’s JV Partners’ Biographies	The Town objects to Exhibit M03 on grounds that it constitutes hearsay for which no exception exists and with respect to which no named witness has first-hand knowledge

¹The Debtor’s list of exhibits was untimely filed under the Court’s evidentiary hearing protocol.

The Town further reserves the right to object at the hearing to testimony concerning the objectionable subject matter contained within the above-referenced exhibits.

Respectfully submitted,

Dated: August 2, 2024,

/s/ Bradley J. Swallow
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Counsel for The Town of Sykesville

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of August 2024, a copy of the foregoing Respondent the Town of Sykesville's Objections to Debtor Warfield Center, LLC's Exhibits for Hearing on August 5, 2024, at 2:00 p.m. was served electronically by the Court's CM/ECF system on the following:

Michael J. Lichtenstein, Esquire mjl@shulmanrogers.com
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/s/ Bradley J. Swallow
Bradley J. Swallow